

We are expressing our support for Franklin County's effort to allow local satellite TV customers to receive Atlanta stations on satellite services. We ask that you approve the request to make this possible.

When we moved to Franklin County from Fulton County, Georgia, 12-years ago, we were appalled to find that we could not receive Georgia News and information – we were required to listen to news and advertisements from the Carolinas. We were so inundated with Carolina information, received so little relevant information, that in short order we stopped listening to the news on TV and did our best to find alternatives. Even though the alternatives were lacking, they were much better than listening to news from the “state capitol” that was totally irrelevant, reports on political candidates that we could not vote for, and political advertising (again for people that we cannot vote for/against).

From the discussion we have seen, it appears that distance to the broadcast tower has been the fundamental determination of appropriate market. We believe that characterization is simplistic and overlooks fundamentals of community and significance. It puts the “orphan counties” in a neglected position, they are appropriately called orphaned counties. One of the fundamental principles of a vibrant republic/democracy is an informed electorate; who take the responsibility of thoughtful voting seriously. That is seriously hampered when the great preponderance of the information is from other jurisdictions than where our citizenship is. We would like to have access to Georgia stations as their programming is more pertinent to our lives and citizenship.

As citizens of the USA and Franklin County, GA in particular, we have joined with our neighbors in expressing our preference. Congressman Collins has already observed that over 94% of the survey respondents favor the move to the Atlanta TV market. In an election a 52 – 48 split is close. A 60 – 40 split is decisive. A 66 – 34 or 75 – 25 split is an overwhelming defeat. Here we are talking about a 94 – 6 split from survey respondents who have been forced to cope with Carolina stations. Clearly, there is an unimaginably strong consensus, by experienced citizens, who want a change.

This change is especially important because, as Congressman Collins has already observed and is working on, Franklin County is at a significant economic, communication, and cultural disadvantage. Much of Franklin County is lacking high speed internet access. While this is a different issue, it is not unrelated. We strongly urge you to support high-speed internet access across our nation. This deficiency is pertinent to this subject of access to Atlanta TV stations, because much of our county has no option (if we had universal high-speed internet access, there could be a discussion about potential information alternatives, but this is not the case). Your approval of satellite TV customers receiving Atlanta stations will provide almost instantaneous improvement, with no need to wait for financing and building out of internet network(s).

We have observed and reviewed the elaborate, expensive, voluminous, joint opposition to this change that the 4 Carolina TV stations have filed. We do not agree with their positions. In fact, we think that they are flawed. I will briefly comment on each of the 5 statutory factors. But before we do that, let us make two summary observations. First, the Carolina TV Stations appear to be setting the standard so high for the first 4 statutory factors, that they negate the intent of the 5th and make it impossible. Second, it appears to us that their filing is more about maintaining control of their market share, keeping our orphaned county locked-up in their market, than providing meaningful service.

First, the Atlanta Stations are not historically carried in Franklin County. This is basically a result of two factors; Physics, good Atlanta signals are not accessible, and current FCC policy, satellite services carry

Carolina stations (which we are asking you to change). Their argument here is a catch-22. Since we don't get Atlanta Stations, we can't have them.

Second, Coverage and Local Service to Franklin County. This is the "Physics" observation mentioned in the first factor. Predominately, distance or drawing circles on maps, favors the Carolina stations. This is pertinent to "local programming" in a very broad sense; providing competition across the nation and avoiding a situation where a few major stations become national satellite networks/content providers. However, their argument does not address the recent legislation that points out that there is more to "local/community programming" than just distance. Prior to this legislation, these factors were not given sufficient consideration. The communities of the Carolinas and Georgia were defined in the founding of our county – long before TV was invented. While we are in small, remote communities, we are still citizens of Georgia, and now that the technology is available we deserve to be treated as the citizens that we are and given the opportunities to be informed participants in our state. Again, the 4 Carolina TV stations have taken a position that is a catch-22, asserting that physics is the sole determiner of community and setting aside the intent of recent legislation.

Third, the 4 Carolina TV stations have asserted that "there is ample and, indeed, superior technical coverage and local programming of specific interest to Franklin County residents from the In-Market Stations", and they support this position with Attachments showing recent local coverage. Let us make two observations. First, the examples seem to be recent – perhaps motivated by the recent legislation permitting us to apply for a change? Second, and far more important, one needs to take a big picture view of the evidence provided. They have listed times when they broadcast Franklin County news. But really, how much is that? How many minutes do we have to watch Carolina news, advertising, weather that is not relevant, to get a minute of something of interest? As I said in the beginning, when we moved to Franklin County we "were so inundated with Carolina information, received so little relevant information, that in short order we stopped listening to the news on TV and did our best to find alternatives". Please approve the change to Atlanta TV stations so Franklin County citizens can get more relevant information. To be clear, I don't expect that the Atlanta TV stations will provide Franklin County or city level local coverage. But the volume of state and Atlanta coverage will be much more significant. And almost infinitely better than spending all the time waiting and watching for the occasional local item that infrequently appears buried in Carolina news and advertising. Also, very specifically, let us make a comment about the weather pictures that are included in the Attachments. They do so some pictures of weather radar for our county. However, we are at the western edge of the picture. What they show, is what we see if I look out our window. What we want to know is what is coming our way. Atlanta TV stations show that because our weather predominately comes from the west and the south. (ASIDE. The Carolina TV stations are similar to the National Oceanographic and Atmospheric Administration (NOAA), which shows us radar weather from Greer, SC. However, NOAA does much better. They let us, with one click, change to other radar stations, so we can see what the weather is like that is coming our way.) In summary on the third point, we believe that their assertion that they provide "superior technical coverage and local programming" is bogus, misleading, frustrating, and a wasteful of our time – there is so little information buried in volumes of uninteresting/irrelevant information about the Carolinas.

Fourth, that "the Atlanta Stations lack any meaningful audience in Franklin Count" is misleading and not relevant. This is a fact directly related to the physics of receiving Atlanta signals and the current FCC decision to place us in the Carolinas Market. Of course, there is lack of meaningful audience when we have no opportunity. This simply repeats the catch-22 from items 1 and 2; asserting that we cannot be in the Atlanta Market because we are not in the Atlanta Market. This assertion is in direct contradiction

to the survey results that Congressman Collins has referenced; 94% of the citizens responding want the Atlanta Market that we are not permitted to have today. The citizens of Franklin County overwhelmingly desire the opportunity to become a meaningful audience for the Atlanta Stations.

Fifth, that “access to in-state programming” was added by Congress in 2014 to be considered along with four other historical factors. The filing by the 4 Carolina TV stations goes on “that new factor is neither exclusive nor dispositive”. It seems to us that they have attempted to define the four other historical factors so narrowly that they are exclusive of the fifth which Congress added in 2014. Defining them this narrowly appears to be an effort to circumvent the efforts of Congress.

Thank you for considering our comments on this decision that is very important to us. We again ask that you find in favor of Franklin County’s request to provide Atlanta TV stations on satellite TV, as desired by 94% of those surveyed.